

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,
and Bernard L. Madoff,

Plaintiff,

v.

ABU DHABI INVESTMENT AUTHORITY,

Defendant.

Adv. Pro. No. 11-02493 (CGM)

**DECLARATION OF MARC L. GREENWALD
IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS THE COMPLAINT**

I, MARC L. GREENWALD, declare under penalty of perjury as follows:

1. I am a member of the firm Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Abu Dhabi Investment Authority ("ADIA"). I respectfully submit this Declaration in support of ADIA's motion to dismiss the Complaint filed by plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC in this

adversary proceeding.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Complaint filed in the above-captioned Adversary Proceeding, with exhibits.

3. Attached hereto as Exhibit 2 is a true and correct copy of the First Amended Complaint filed by the Trustee in the matter captioned *Picard v. Fairfield Sentry Ltd., et al.*, Adv. Pro. 09-01239 (Bankr. S.D.N.Y. July 20, 2010) (the “Fairfield Action”), Dkt. 23, without exhibits.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Settlement Agreement dated as of May 9, 2011 between the Trustee and Kenneth Kryz and Joanna Lau, as Joint Liquidators of Fairfield Sentry Limited (“Sentry”), Fairfield Sigma Limited, and Fairfield Lambda Limited, filed in the Fairfield Action, Dkt. 69-2, without exhibits.

5. Attached hereto as Exhibit 4 is a true and correct copy of the First Amended Complaint filed by the Liquidators of Fairfield Sentry in the matter captioned *Fairfield Sentry Limited (In Liquidation) v. Abu Dhabi Investment Authority*, Adv. Proc. No. 11-01719 (Bankr. S.D.N.Y. Apr. 15, 2011), Dkt. 4.

6. Attached hereto as Exhibit 5 is a true and correct copy of Fairfield Sentry’s Memorandum of Association and Articles of Association, filed as an exhibit to the Declaration of William Hare, counsel for the Liquidators of the Fairfield Funds, in the matter captioned *Fairfield Sentry Limited (In Liquidation) v. Abu Dhabi Investment Authority*, Adv. Proc. No. 11-01719 (Bankr. S.D.N.Y. Oct. 27, 2016), Dkt. 16-6.

7. Attached hereto as Exhibit 6 is a true and correct copy of the United Kingdom Privy Council’s judgment in *Fairfield Sentry Ltd. v. Migani*, [2014] UKPC 9, available at <https://www.jcpc.uk/cases/docs/jcpc-2012-0061-judgment.pdf>.

8. Attached hereto as Exhibit 7 are true and correct copies of the following

documents:

(a)	Exhibit C to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Citibank N.A. et al.</i> , Adv. Pro. No. 10-05345 (Bankr. S.D.N.Y.), Dkt. 214-3
(b)	Excerpts from the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Merrill Lynch International</i> , Adv. Pro. No. 10-05346 (Bankr. S.D.N.Y.), Dkt. 1-1, page 43
(c)	Exhibit D to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Nomura International PLC</i> , Adv. Pro. No. 10-05348 (Bankr. S.D.N.Y.), Dkt. 42-4
(d)	Excerpts from the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco Bilbao Vizcaya Argentaria, S.A.</i> , Adv. Pro. No. 10-05351 (Bankr. S.D.N.Y.), Dkt. 1-1, page 44
(e)	Excerpts from the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Pictet at Cie</i> , Adv. Pro. No. 11-01724 (Bankr. S.D.N.Y.), Dkt. 1, page 24
(f)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Safra National Bank of New York</i> , Adv. Pro. No. 11-01885 (Bankr. S.D.N.Y.), Dkt. 1-3
(g)	Exhibit K to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque SYZ & Co., S.A.</i> , Adv. Pro. No. 11-02149 (Bankr. S.D.N.Y.), Dkt. 1-11
(h)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Abu Dhabi Investment Authority</i> , Adv. Pro. No. 11-02493 (Bankr. S.D.N.Y.), Dkt. 1-5
(i)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Orbita Capital Return Strategy Limited</i> , Adv. Pro. No. 11-02537 (Bankr. S.D.N.Y.), Dkt. 1-3
(j)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Quilvest Finance Ltd.</i> , Adv. Pro. No. 11-02538 (Bankr. S.D.N.Y.), Dkt. 1-4
(k)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Meritz Fire & Marine Insurance Co. Ltd.</i> , Adv. Pro. No. 11-02539 (Bankr. S.D.N.Y.), Dkt. 1-3
(l)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lion Global Investors Limited</i> , Adv. Pro. No. 11-02540 (Bankr. S.D.N.Y.), Dkt. 1-4
(m)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. First Gulf Bank</i> , Adv. Pro. No. 11-02541 (Bankr. S.D.N.Y.), Dkt. 1-4

(n)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Parson Finance Panama S.A.</i> , Adv. Pro. No. 11-02542 (Bankr. S.D.N.Y.), Dkt. 1-3
(o)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Delta National Bank and Trust Company</i> , Adv. Pro. No. 11-02551 (Bankr. S.D.N.Y.), Dkt. 1-4
(p)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Unifortune Asset Management SGR SPA et ano.</i> , Adv. Pro. No. 11-02553 (Bankr. S.D.N.Y.), Dkt. 1-3
(q)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. National Bank of Kuwait S.A.K.</i> , Adv. Pro. No. 11-02554 (Bankr. S.D.N.Y.), Dkt. 1-4
(r)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Cathay Life Insurance Co. LTD</i> , Adv. Pro. No. 11-02568 (Bankr. S.D.N.Y.), Dkt. 1-4
(s)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Cathay Life Insurance Co. LTD</i> , Adv. Pro. No. 11-02568 (Bankr. S.D.N.Y.), Dkt. 1-5
(t)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barclays Bank (Suisse) S.A. et al.</i> , Adv. Pro. No. 11-02569 (Bankr. S.D.N.Y.), Dkt. 1-4
(u)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barclays Bank (Suisse) S.A. et al.</i> , Adv. Pro. No. 11-02569 (Bankr. S.D.N.Y.), Dkt. 1-7
(v)	Exhibit I to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barclays Bank (Suisse) S.A. et al.</i> , Adv. Pro. No. 11-02569 (Bankr. S.D.N.Y.), Dkt. 1-9
(w)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banca Carige S.P.A.</i> , Adv. Pro. No. 11-02570 (Bankr. S.D.N.Y.), Dkt. 1-3
(x)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Privee Espirito Santo S.A. formerly known as Compagnie Bancaire Espirito Santo S.A.</i> , Adv. Pro. No. 11-02571 (Bankr. S.D.N.Y.), Dkt. 1-4
(y)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Korea Exchange Bank, Individually and as Trustee for Korea Global All Asset Trust I-I, and for Tams Rainbow Trust III</i> , Adv. Pro. No. 11-02572 (Bankr. S.D.N.Y.), Dkt. 1-3
(z)	Exhibit D to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. The Sumitomo Trust and Banking Co., Ltd.</i> , Adv. Pro. No. 11-02573 (Bankr. S.D.N.Y.), Dkt. 8-4

(aa)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ASB Bank Corp.</i> , Adv. Pro. No. 11-02730 (Bankr. S.D.N.Y.), Dkt. 1-4
(bb)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Trincaster Corporation</i> , Adv. Pro. No. 11-02731 (Bankr. S.D.N.Y.), Dkt. 1-3
(cc)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bureau of Labor Insurance</i> , Adv. Pro. No. 11-02732 (Bankr. S.D.N.Y.), Dkt. 1-3
(dd)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Naidot & Co.</i> , Adv. Pro. No. 11-02733 (Bankr. S.D.N.Y.), Dkt. 1-3
(ee)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Caceis Bank, Caceis Bank Luxembourg</i> , Adv. Pro. No. 11-02758 (Bankr. S.D.N.Y.), Dkt. 1-4
(ff)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ABN AMRO Bank N.V. (now known as The Royal Bank of Scotland, N.V.)</i> , Adv. Pro. No. 11-02760 (Bankr. S.D.N.Y.), Dkt. 1-3
(gg)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lighthouse Investment Partners LLC, doing business as Lighthouse Partners</i> , Adv. Pro. No. 11-02762 (Bankr. S.D.N.Y.), Dkt. 1-4
(hh)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lighthouse Investment Partners LLC, doing business as Lighthouse Partners</i> , Adv. Pro. No. 11-02762 (Bankr. S.D.N.Y.), Dkt. 1-5
(ii)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Inteligo Bank LTD. Panama Branch, formerly known as Blubank LTD. Panama Branch</i> , Adv. Pro. No. 11-02763 (Bankr. S.D.N.Y.), Dkt. 1-4
(jj)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Somers Dublin Limited et al.</i> , Adv. Pro. No. 11-02784 (Bankr. S.D.N.Y.), Dkt. 1-3
(kk)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Merrill Lynch Bank (Suisse) SA</i> , Adv. Pro. No. 11-02910 (Bankr. S.D.N.Y.), Dkt. 1-3
(ll)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Julius Baer & Co. Ltd.</i> , Adv. Pro. No. 11-02922 (Bankr. S.D.N.Y.), Dkt. 1-3
(mm)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Falcon Private Bank Ltd. (formerly known as AIG Privat Bank AG)</i> , Adv. Pro. No. 11-02923 (Bankr. S.D.N.Y.), Dkt. 1-3

(nn)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Suisse AG et al.</i> , Adv. Pro. No. 11-02925 (Bankr. S.D.N.Y.), Dkt. 1-5
(oo)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. LGT Bank in Liechtenstein Ltd.</i> , Adv. Pro. No. 11-02929 (Bankr. S.D.N.Y.), Dkt. 1-3
(pp)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. The Public Institution for Social Security.</i> , Adv. Pro. No. 12-01002 (Bankr. S.D.N.Y.), Dkt. 1-3
(qq)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Fullerton Capital PTE Ltd.</i> , Adv. Pro. No. 12-01004 (Bankr. S.D.N.Y.), Dkt. 1-3
(rr)	Exhibit F to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. SICO Limited</i> , Adv. Pro. No. 12-01005 (Bankr. S.D.N.Y.), Dkt. 14-6
(ss)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco Itau Europa Luxembourg S.A. et ano.</i> , Adv. Pro. No. 12-01019 (Bankr. S.D.N.Y.), Dkt. 1-6
(tt)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco Itau Europa Luxembourg S.A. et ano.</i> , Adv. Pro. No. 12-01019 (Bankr. S.D.N.Y.), Dkt. 1-7
(uu)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Grosvenor Investment Management Ltd. et al.</i> , Adv. Pro. No. 12-01021 (Bankr. S.D.N.Y.), Dkt. 1-3
(vv)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Grosvenor Investment Management Ltd. et al.</i> , Adv. Pro. No. 12-01021 (Bankr. S.D.N.Y.), Dkt. 1-4
(ww)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Grosvenor Investment Management Ltd. et al.</i> , Adv. Pro. No. 12-01021 (Bankr. S.D.N.Y.), Dkt. 1-5
(xx)	Exhibit J to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Agricole (Suisse) S.A. et al.</i> , Adv. Pro. No. 12-01022 (Bankr. S.D.N.Y.), Dkt. 1-10
(yy)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Arden Asset Management Inc. et al.</i> , Adv. Pro. No. 12-01023 (Bankr. S.D.N.Y.), Dkt. 1-3
(zz)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. SNS Bank N.V. et ano.</i> , Adv. Pro. No. 12-01046 (Bankr. S.D.N.Y.), Dkt. 1-3

(aaa)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Koch Industries, Inc., as successor in interest to Koch Investment (UK) Company</i> , Adv. Pro. No. 12-01047 (Bankr. S.D.N.Y.), Dkt. 1-3
(bbb)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco General S.A. et ano.</i> , Adv. Pro. No. 12-01048 (Bankr. S.D.N.Y.), Dkt. 1-3
(ccc)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Kookmin Bank</i> , Adv. Pro. No. 12-01194 (Bankr. S.D.N.Y.), Dkt. 1-3
(ddd)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Six Sis AG</i> , Adv. Pro. No. 12-01195 (Bankr. S.D.N.Y.), Dkt. 1-3
(eee)	Exhibit I to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Vontobel AG formerly known as Bank J. Vontobel & Co. AG</i> , Adv. Pro. No. 12-01202 (Bankr. S.D.N.Y.), Dkt. 1-9
(fff)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Multi-Strategy Fund Limited et ano.</i> , Adv. Pro. No. 12-01205 (Bankr. S.D.N.Y.), Dkt. 1-6
(ggg)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lloyds TSB Bank PLC</i> , Adv. Pro. No. 12-01207 (Bankr. S.D.N.Y.), Dkt. 1-3
(hhh)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BSI AG, individually and as successor in interest to Banco Del Gottardo</i> , Adv. Pro. No. 12-01209 (Bankr. S.D.N.Y.), Dkt. 1-3
(iii)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BSI AG, individually and as successor in interest to Banco Del Gottardo</i> , Adv. Pro. No. 12-01209 (Bankr. S.D.N.Y.), Dkt. 1-4
(jjj)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Schroder & Co. Bank AG</i> , Adv. Pro. No. 12-01210 (Bankr. S.D.N.Y.), Dkt. 1-14
(kkk)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Union Securities Investment Trust Co., Ltd. et al.</i> , Adv. Pro. No. 12-01211 (Bankr. S.D.N.Y.), Dkt. 1-3
(lll)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Union Securities Investment Trust Co., Ltd. et al.</i> , Adv. Pro. No. 12-01211 (Bankr. S.D.N.Y.), Dkt. 1-4
(mmm)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Union Securities Investment Trust Co., Ltd. et al.</i> , Adv. Pro. No. 12-01211 (Bankr. S.D.N.Y.), Dkt. 1-5

(nnn)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Hapoalim (Switzerland) Ltd. et al.</i> , Adv. Pro. No. 12-01216 (Bankr. S.D.N.Y.), Dkt. 1-6
(ooo)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Hapoalim (Switzerland) Ltd. et al.</i> , Adv. Pro. No. 12-01216 (Bankr. S.D.N.Y.), Dkt. 1-7
(ppp)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ZCM Asset Holding Company (Bermuda) LLC</i> , Adv. Pro. No. 12-01512 (Bankr. S.D.N.Y.), Dkt. 1-6
(qqq)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Citivic Nominees Ltd.</i> , Adv. Pro. No. 12-01513 (Bankr. S.D.N.Y.), Dkt. 1-3
(rrr)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Standard Chartered Defendants</i> , Adv. Pro. No. 12-01565 (Bankr. S.D.N.Y.), Dkt. 1-6
(sss)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. UKFP (Asia) Nominees Limited</i> , Adv. Pro. No. 12-01566 (Bankr. S.D.N.Y.), Dkt. 1-2
(ttt)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A.</i> , Adv. Pro. No. 12-01576 (Bankr. S.D.N.Y.), Dkt. 1-3
(uuu)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. UBS Deutschland AG as successor in interest to Dresdner Bank LateinAmerika AG et ano.</i> , Adv. Pro. No. 12-01577 (Bankr. S.D.N.Y.), Dkt. 1-3
(vvv)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. UBS Deutschland AG as successor in interest to Dresdner Bank LateinAmerika AG et ano.</i> , Adv. Pro. No. 12-01577 (Bankr. S.D.N.Y.), Dkt. 1-4
(www)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barfield Nominees Limited</i> , Adv. Pro. No. 12-01669 (Bankr. S.D.N.Y.), Dkt. 1-9
(xxx)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Agricole Corporate and Investment Bank doing business as Credit Agricole Private Banking Miami, formerly known as Calyon S.A. doing business as Credit Agricole Miami Private Bank, Successor in Interest to Credit Lyonnais S.A.</i> , Adv. Pro. No. 12-01670 (Bankr. S.D.N.Y.), Dkt. 1-9
(yyy)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Suisse AG, as successor in interest to Clariden Leu AG and Bank Leu AG</i> , Adv. Pro. No. 12-01676 (Bankr. S.D.N.Y.), Dkt. 1-5

(zzz)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Societe Generale Private Banking (Suisse) S.A. formerly known as SG Private Banking Suisse S.A. et al.</i> , Adv. Pro. No. 12-01677 (Bankr. S.D.N.Y.), Dkt. 1-5
(aaaa)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Intesa Sanpaolo SpA (as Successor in Interest to Banca Intesa SpA) et al.</i> , Adv. Pro. No. 12-01680 (Bankr. S.D.N.Y.), Dkt. 1-3
(bbbb)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Intesa Sanpaolo SpA (as Successor in Interest to Banca Intesa SpA) et al.</i> , Adv. Pro. No. 12-01680 (Bankr. S.D.N.Y.), Dkt. 1-4
(cccc)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. EFG Bank S.A., formerly known as EFG Private Bank S.A. et al.</i> , Adv. Pro. No. 12-01690 (Bankr. S.D.N.Y.), Dkt. 1-7
(dddd)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Degroof SA/NV also known as Banque Degroof Bruxelles et al.</i> , Adv. Pro. No. 12-01691 (Bankr. S.D.N.Y.), Dkt. 1-3
(eeee)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Degroof SA/NV also known as Banque Degroof Bruxelles et al.</i> , Adv. Pro. No. 12-01691 (Bankr. S.D.N.Y.), Dkt. 1-4
(ffff)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Lombard Odier & Cie SA</i> , Adv. Pro. No. 12-01693 (Bankr. S.D.N.Y.), Dkt. 1-3
(gggg)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Cantonale Vaudoise</i> , Adv. Pro. No. 12-01694 (Bankr. S.D.N.Y.), Dkt. 1-3
(hhhh)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bordier & Cie</i> , Adv. Pro. No. 12-01695 (Bankr. S.D.N.Y.), Dkt. 1-3
(iiii)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ABN AMRO Fund Services (Isle of Man) Nominees Limited, formerly known as Fortis (Isle Of Man) Nominees Limited et al.</i> , Adv. Pro. No. 12-01697 (Bankr. S.D.N.Y.), Dkt. 1-3
(jjjj)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Internationale a Luxembourg S.A. (formerly known as Dexia Banque Internationale a Luxembourg S.A.), individually and as successor in interest to Dexia Nordic Private Bank S.A. et al.</i> , Adv. Pro. No. 12-01698 (Bankr. S.D.N.Y.), Dkt. 1-5
(kkkk)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Royal Bank of Canada et al.</i> , Adv. Pro. No. 12-01699 (Bankr. S.D.N.Y.), Dkt. 1-5

9. Attached hereto as Exhibit 8 are true and correct copies of Exhibits 5 and 6 to the Second Amended Complaint filed in the Fairfield Action, Dkts. 286-5, 286-6.

10. Attached hereto as Exhibit 9 are true and correct copies of Exhibits 8, 10, 12, 13, 14 and 21 to the Second Amended Complaint filed in the Fairfield Action, Dkts. 286-8, 286-10, 286-12, 286-13, 286-14, 286-21.

11. Attached hereto as Exhibit 10 is a true and correct copy of the Eastern Caribbean Court of Appeal's decision in *Quilvest Finance Ltd. v. Fairfield Sentry Ltd.*, Case Nos. HCVAP 2011/041–052, available at <https://www.eccourts.org/quilvest-finance-ltd-and-others-v-fairfield-sentry-ltd/>

12. Set forth below is a chart calculating the sum total of amounts claimed by the Trustee as subsequent transfers from Sentry after May 9, 2003,¹ in the complaints and/or exhibits thereto set forth at Exhibit 7 hereto:²

ADV. PROC.	DEFENDANT(S)	AMOUNT
10-05345	Citibank, N.A., et al.	(\$100,000,000)
10-05346	Merrill Lynch International	(\$14,200,000)
10-05348	Nomura International PLC	(\$20,013,186)
10-05351	Banco Bilbao Vizcaya Argentaria, S.A.	(\$45,000,000)

¹ According to Exhibit D to the Complaint in this proceeding (Exhibit 1 hereto), May 9, 2003 is the date of the first alleged BLMIS-to-Sentry initial transfer within the six-year lookback period, calculating back from the Filing Date of December 11, 2008.

² Where applicable, the numbers in this chart have been adjusted to reflect the dismissal of certain claims in the adversary proceedings identified below, pursuant to the following: (i) Stipulation and Order entered on December 21, 2021, in the matter captioned *Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC v. The Public Institution for Social Security*, Adv. Pro. No. 12-01002 (Bankr. S.D.N.Y.), ECF No. 111; (ii) Stipulation and Order entered on January 27, 2022, in the matter captioned *Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Lombard Odier & Cie SA*, Adv. Pro. No. 12-01693 (Bankr. S.D.N.Y.), ECF No. 87; (iii) Stipulation and Order entered on February 22, 2022, in the matter captioned *Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC v. Schroder & Co. Bank AG*, Adv. Pro. No. 12-01210 (Bankr. S.D.N.Y.), ECF No. 89; (iv) Stipulation and Order entered on February 14, 2022, in the matter captioned *Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC v. Barclays Bank (Suisse) S.A., Caixabank. S.A., and Zedra Trust Company (Jersey) Limited*, Adv. Pro. No. 11-02569 (Bankr. S.D.N.Y.), ECF No. 122.

ADV. PROC.	DEFENDANT(S)	AMOUNT
11-01724	Pictet et Cie.	(\$50,386,685)
11-01885	Safra New York	(\$95,853,574)
11-02149	Banque Syz & Co., SA	(\$15,449,241)
11-02493	Abu Dhabi Investment Authority	(\$300,000,000)
11-02537	Orbita	(\$30,662,226)
11-02538	Quilvest Finance Ltd.	(\$37,800,113)
11-02539	Meritz Fire & Insurance Co. Ltd.	(\$21,855,898)
11-02540	Lion Global Investors Limited	(\$50,583,442)
11-02541	First Gulf Bank	(\$11,532,393)
11-02542	Parson Finance Panama S.A.	(\$11,089,081)
11-02551	Delta National Bank and Trust Company	(\$20,634,958)
11-02553	Unifortune Asset Management SGR SpA, et al.	(\$16,355,650)
11-02554	National Bank of Kuwait S.A.K.	(\$18,724,399)
11-02568	Cathay Life Insurance Co. Ltd.	(\$24,496,799)
11-02568	Cathay Bank	(\$17,206,126)
11-02569	Barclays Private Bank	(\$820,636)
11-02569	Barclays Spain	(\$4,719,252)
11-02569	Barclays Bank (Suisse) S.A. et al.	(\$37,973,175)
11-02570	Banca Carige S.P.A.	(\$10,532,489)
11-02571	BPES	(\$11,426,745)
11-02572	Korea Exchange Bank	(\$33,593,106)
11-02573	The Sumitomo Trust and Banking Co., Ltd.	(\$54,253,642)
11-02730	Atlantic Security Bank	(\$120,168,691)
11-02731	Trincaster Corporation	(\$13,311,800)
11-02732	Bureau of Labor Insurance	(\$42,123,406)
11-02733	Naidot & Co.	(\$13,654,907)
11-02758	Caceis Bank Luxembourg, et al.	(\$24,052,228)
11-02760	ABN Amro Bank N.V., et al.	(\$2,808,105)
11-02762	Lighthouse Diversified	(\$7,913,873)
11-02762	Lighthouse Supercash	(\$3,251,378)
11-02763	Inteligo Bank Ltd.	(\$10,745,160)
11-02784	Somers Dublin Limited et al.	(\$1,985,648)
11-02910	Merrill Lynch Bank (Suisse) SA	(\$44,127,787)
11-02922	Bank Julius Baer & Co. Ltd.	(\$35,258,617)
11-02923	Falcon Private Bank Ltd.	(\$38,675,129)
11-02925	Credit Suisse AG et al.	(\$256,629,647)
11-02929	LGT Bank in Liechtenstein Ltd.	(\$10,350,118)
12-01002	The Public Institution For Social Security	(\$20,000,000)

ADV. PROC.	DEFENDANT(S)	AMOUNT
12-01004	Fullerton Capital PTE Ltd.	(\$10,290,445)
12-01005	SICO LIMITED	(\$14,544,620)
12-01019	Banco Itau Europa Luxembourg S.A., et al.	(\$60,595,069)
12-01019	Banco Itau International	(\$9,969,942)
12-01021	Grosvenor Aggressive	(\$4,191,288)
12-01021	Grosvenor Balanced	(\$13,000,000)
12-01021	Grosvenor Private	(\$14,315,101)
12-01022	Credit Agricole (Suisse) SA	(\$15,654,127)
12-01023	Arden Asset Management, et al.	(\$12,586,659)
12-01046	SNS Bank N.V. et al.	(\$21,060,551)
12-01047	Koch Industries, Inc.	(\$21,533,871)
12-01048	Banco General S.A. et al.	(\$8,240,499)
12-01194	Kookmin Bank	(\$42,010,303)
12-01195	Six Sis AG	(\$379,248)
12-01202	Bank Vontobel AG et al.	(\$8,470,371)
12-01205	Multi Strategy Fund Ltd., et al.	(\$25,763,374)
12-01207	Lloyds TSB Bank PLC	(\$11,134,574)
12-01209	BSI AG	(\$27,452,138)
12-01209	Banca del Gottardo	(\$20,058,735)
12-01210	Schroder & Co.	(\$25,116,802)
12-01211	Union Securities Investment Trust Co., Ltd., et al.	(\$6,477,447)
12-01211	Union Global Fund	(\$9,283,664)
12-01211	Union Strategy Fund	(\$1,445,016)
12-01216	Bank Hapoalim Switzerland	(\$20,047,109)
12-01216	Bank Hapoalim B.M.	(\$1,712,100)
12-01512	ZCM Asset Holding Co. (Bermuda) LLC	(\$24,491,791)
12-01513	CITIVIC	(\$59,479,232)
12-01565	Standard Chartered Financial Services (Luxembourg) SA, et al.	(\$275,267,978)
12-01566	UKFP (Asia) Nominees	(\$8,012,183)
12-01576	BNP Paribas S.A., et al.	(\$3,423,188)
12-01577	UBS Deutschland AG, et al.	(\$7,230,511)
12-01577	LGT Switzerland	(\$522,826)
12-01669	Barfield Nominees Ltd., et al.	(\$16,178,329)
12-01670	Credit Agricole Corporate and Investment Bank/BBH	(\$26,121,583)
12-01676	Clariden Leu AG	(\$35,838,401)
12-01677	Societe General Private Banking (Suisse) SA, et al.	(\$128,678,138)
12-01680	Intesa Sanpaolo SpA-Low Volatility	(\$7,913,079)
12-01680	Intesa Sanpaolo SpA-Medium Volatility	(\$3,740,436)

ADV. PROC.	DEFENDANT(S)	AMOUNT
12-01690	EFG Bank S.A., et al.	(\$201,594,824)
12-01691	Banque Degroof Luxembourg	(\$1,303,203)
12-01691	Banque Degroof	(\$58,473)
12-01693	Banque Lombard Odier & Cie	(\$93,511,466)
12-01694	Banque Cantonale Vaudoise	(\$9,769,927)
12-01695	Bordier & Cie	(\$7,928,454)
12-01697	ABN AMRO Fund Services (Isle of Man) Nominees Ltd., et al.	(\$122,001,935)
12-01698	Banque International a Luxembourg SA/Dexia	(\$61,515,524)
12-01699	Royal Bank of Canada, et al.	(\$38,182,649)
	Total Sentry Six-Year Transfers to Investors	(\$3,238,316,493)
	Less Pre-May 9, 2003 transfers	\$66,839,526
	Total Sentry Six-Year Transfers to Investors After First Potentially Avoidable Sentry Initial Transfer (May 9, 2003)	(\$3,171,476,967)

13. Set forth below is a chart calculating the sum total of amounts claimed by the Trustee as subsequent transfers from Sentry after May 9, 2003 in Exhibits 8, 10, 12, 13, 14 and 21 to the Second Amended Complaint in the Fairfield Action, attached as Exhibit 4 hereto:

EXHIBIT NO.	DEFENDANT(S)	AMOUNT
286-8	FIF Advanced Limited	(\$45,206,428)
286-10	Fairfield Investment Fund Limited	(\$337,718,887)
286-12	Fairfield Greenwich Limited	(\$87,440,586)
286-13	Fairfield Greenwich (Bermuda) Limited	(\$611,613,040)
286-14	Fairfield Greenwich Advisors	(\$56,013,598)
286-21	Amit Vijayvergiya	(\$955,465)
	Total Sentry Six-Year Transfers to Investors	(\$1,138,948,004)
	Less Pre-May 9, 2003 transfers	\$103,688,693
	Total Sentry Six-Year Transfers to Investors After First Potentially Avoidable Sentry Initial Transfer (May 9, 2003)	(\$1,035,259,311)

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 11, 2022
New York, New York

/s/ Marc L. Greenwald
Marc L. Greenwald